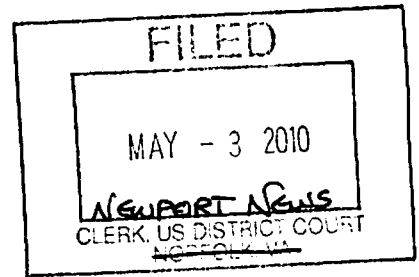


**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**



TATYANA A. BABAKAEVA,)

Plaintiff,)

v.)

Action No. 4:09cv58

PAUL H. WILSON and)

WILSON & WILSON, P.C.,)

Defendants.)

CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to EDVA Local Civil Rule 56 and Fed.R.Civ.P. 56(d)(2) Plaintiff, Tatyana A. Babakaeva, *pro se*, ("Babakaeva") respectfully submits this Motion for Partial Summary Judgment on liability alone as to her claims for relief on all Counts I – VII.

Federal Rule of Civil Procedure 56(c) permits the Court to grant partial summary judgment if the pleadings, discovery, and affidavits show that there is no genuine issue of material fact and that a plaintiff is entitled to judgment as a matter of law. Federal Rule of Civil Procedure 56(d)(2) permits the Court to render interlocutory summary judgment on liability alone, even if there is a genuine issue on the amount of damages.

Here, the undisputed facts show that Babakaeva is entitled to judgment as a matter of law in her favor on Counts I – VII of her First Amended Complaint. This motion is further supported by the memorandum and the declarations of Tatyana Babakaeva and Natalie Nanasi, filed and served herewith.

DATED this 3rd day of May, 2010.

Respectfully submitted,

Tatyana Babakaeva

Tatyana A. Babakaeva, *pro se*
2124 Criston Dr
Newport News, VA 23602
Phone: (757) 249-3072

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of May, 2010 I hand delivered a true and accurate copy of the foregoing Cross-Motion to:

James Shoemaker, Esquire
Counsel for Defendants
Patten, Wornom, Hatten & Diamonstein, L.C.
12350 Jefferson Ave., Suite 300
Newport News, VA 23602

Tatyana Babakaeva

Tatyana A. Babakaeva, *pro se*
2124 Criston Dr
Newport News, VA 23602
Phone: (757) 249-3072